

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

KAROLINA KARPOV,  
Plaintiff,

Civil Action No.  
12:1411-GMS

-against-

VLADIMIR KARPOV, et al.  
Defendant.

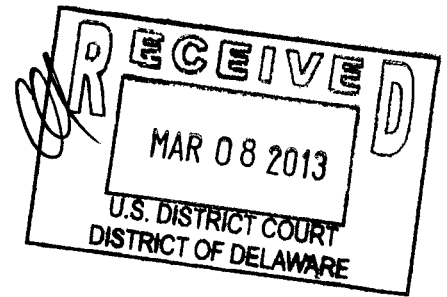
---

Answer to Original Complaint filed  
In New York District Court, from  
Vladimir Karpov, Defendant.

Defendant Vladimir Karpov (hereinafter referred to as "Defendant or I"), hereby respond to Plaintiff's Complaint (the "Complaint"), as follows:

ANSWERING ALLEGATIONS

1. Deny
2. Deny
3. Deny
4. Deny
5. Admit
6. Admit
7. Deny- now plaintiff is 19
8. Admit
9. Deny- no proof of this allegation
10. Deny
11. Deny
12. Deny- plaintiff is bi-racial, and documented as WHITE
13. Admit
14. Admit
15. Admit
16. Deny- Pastor Vladimir Vysotskiy, Senior
17. Deny- plaintiff's FOSTER parents were Annya and Slavik Horbatiyy
18. Admit
19. Admit
20. Admit
21. Deny- 56 years of age
22. Deny- I built a substantial real estate business only before my sentencing, in 2007.  
Business went under bankruptcy, filed in 2007, approved in 2009.
23. Deny- I am incarcerated at JTVCC
24. Not sure
25. Not sure



26. Deny- registration, as I understand, must happen at the time of release.
27. Not sure
28. Admit- but there is no medical proof. I took plea bargain to avoid lifetime in prison.
29. Deny- I can have contact with my underage children.
30. Deny- this never occurred. Also, I have never contacted plaintiff, not directly, nor through 3<sup>rd</sup> party. Otherwise, I would have been violating the no-contact order. There was NEVER a complaint of this from plaintiff.
31. Deny- this never occurred. Plaintiff is lying.
32. Deny- Svetlana Karpov is no longer domiciled in Delaware
33. Admit
34. Admit
35. Admit
36. Deny- Svetlana Karpov is now 43
37. Deny- Svetlana Karpov did no such thing.
38. Deny- Foster mother, Annya Horbatiyy begged me to adopt plaintiff and take her to America for a better life. No documents were executed.
39. Deny- plaintiff was never adopted by Horbatiyy family. She was fostered by them, until they just pushed her into my wife's and my care, telling us that they wanted better life for her. In reality, they were tied down to Ukraine, and would be unable to immigrate to United States since they did not qualify as adoption parents. If they left, Karolina would have no one to take care of her.
40. Deny
41. Deny- in a court testimony, signed by the Ukrainian Adoption Court, Slavik Horbatiyy states that the reason he would like us to adopt Karolina is because they want Karolina to have a better life, and to never suffer from racism since bi-racial and blacks were not socially accepted in the Ukrainian society.
42. Deny
43. Deny
44. Deny
45. Deny
46. Deny
47. Deny
48. Deny
49. Deny
50. Deny
51. Deny
52. Deny
53. Deny
54. Deny
55. Deny
56. Deny
57. Deny
58. Deny
59. Deny
60. Deny
61. Deny

- 62. Deny
- 63. Deny
- 64. Deny
- 65. Deny
- 66. Deny
- 67. Deny
- 68. Deny
- 69. Deny
- 70. Deny
- 71. Deny
- 72. Deny
- 73. Deny
- 74. Deny
- 75. Deny
- 76. Deny
- 77. Deny
- 78. Deny
- 79. Deny
- 80. Deny
- 81. Deny
- 82. Deny
- 83. Deny
- 84. Deny
- 85. Deny
- 86. Deny
- 87. Deny
- 88. Deny
- 89. Deny
- 90. Deny
- 91. Deny
- 92. Deny
- 93. Deny
- 94. Deny
- 95. Deny
- 96. Deny
- 97. Deny
- 98. Deny
- 99. Deny
- 100. Deny
- 101. Deny
- 102. Deny
- 103. Deny
- 104. Deny
- 105. Deny
- 106. Deny
- 107. Deny

108.      A. Deny  
            B. Admit  
            C. Deny  
            D. Admit  
            E. Admit  
            A. Deny  
            B. Admit  
            C. Admit
109.      Deny
110.      Deny
111.      Deny
112.      Deny
113.      Deny
114.      Deny
115.      Deny
116.      Deny
117.      Deny
118.      Deny
119.      Deny
120.      Deny
121.      Admit- there is nothing for plaintiff.
122.      Deny
123.      Deny
124.      Deny
125.      Deny
126.      Deny
127.      Deny
128.      Deny
129.      Deny
130.      Deny
131.      Deny
132.      Deny
133.      Deny
134.      Deny
135.      Deny
136.      Deny
137.      Deny
138.      Deny
139.      Deny
140.      Deny
141.      Deny
142.      Deny
143.      Deny
144.      Deny
145.      Deny

- 146. Deny
- 147. Deny
- 148. Deny
- 149. Deny
- 150. Deny
- 151. Deny
- 152. Deny
- 153. Deny
- 154. Deny
- 155. Deny
- 156. Deny
- 157. Deny
- 158. Deny
- 159. Deny
- 160. Deny
- 161. Deny
- 162. Deny
- 163. Deny
- 164. Deny
- 165. Deny
- 166. Deny
- 167. Deny
- 168. Deny
- 169. Deny
- 170. Deny
- 171. Deny
- 172. Deny
- 173. Deny
- 174. Deny
- 175. Deny
- 176. Deny
- 177. Deny
- 178. Deny
- 179. Deny
- 180. Deny
- 181. Deny
- 182. Deny
- 183. Deny
- 184. Deny
- 185. Deny
- 186. Deny


\*Please take note that I cannot file electronically, as I have no internet access.

RESERVATION OF RIGHTS CLAUSE

Defendants reserve the right to raise additional affirmative defenses.

WHEREFORE, judgment is demanded dismissing the Complaint against the Defendant, Svetlana Karpov, with prejudice, with costs and disbursements, including such other and further relief as this Court may find just and proper.

Dated: SET FORTH Smyrna, Delaware  
March 06, 2013

  
VLADIMIR KARPOV  
SBI# 433133  
1181 PADDOCK RD  
SMYRNA, DE 19977

Affidavit of Service

I, Vladimir Karpov, am affirming that I have prepared and certified-mailed this answer to:

1. The United States District Court of Delaware  
J Caleb Boggs Federal Building  
844 North King Street  
Unit 18  
Wilmington, DE 19801-3570
2. Plaintiff, Karolina Karpov  
305 Mill Street  
Apt 2A  
Poughkeepsie, NY 12601
3. Defendant, Kristina Multani  
402 Blaine Avenue  
Apt 2C  
West Berlin, NJ 08091
4. Defendant, Victoria Kryachkov  
PO BOX 80245  
Lincoln, NE 68501
5. Defendant, Emily Karpov  
482 W Chestnut Hill Rd  
Newark, DE 19713-1102
6. Defendant, Svetlana Karpov  
482 W Chestnut Hill Rd  
Newark, DE 19713-1102

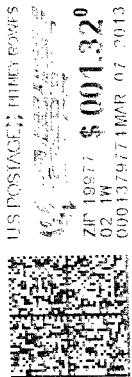
TO: Vladimir Karpov

SBI# 433133 UNIT E

JAMES T. VAUGHN CORRECTIONAL CENTER

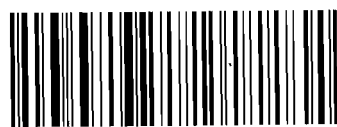
1181 PADDOCK ROAD

SMYRNA, DELAWARE 1977



Hon. Gregory M. Sleet  
US District Court of DE  
844 N. King St. Room 4324, Unit 19,  
Wilmington, DE  
19801-3569

CERTIFIED MAIL  
PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE



2008 1140 0004 4495 4162

2008 1140 0004 4495 4162